

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LUIS HOMMY RODRIGUEZ VAZQUEZ
RUTH JACQUELINE CRUZ MERCED

DEBTORS

LUIS HOMMY RODRIGUEZ VAZQUEZ
RUTH JACQUELINE CRUZ MERCED

PLAINTIFFS

V.

USDA RURAL HOUSING SERVICE
DEFENDANT

CASE NO 20-03819 MCF

CHAPTER 13

ADV. PROC. NO. 21-00024

COMPLAINT TO
DETERMINE VALIDITY
OF LIEN RULE 7001(2) FRBP

**MOTION REQUESTING CONTINUANCE OF INITIAL SCHEDULING
CONFERENCE SCHEDULED FOR JUNE 16, 2021 AT 9:00AM**

TO THE HONORABLE COURT:

COME NOW, LUIS HOMMY RODRIGUEZ VAZQUEZ and RUTH JACQUELINE CRUZ MERCED, the Plaintiffs, through their undersigned attorney, and very respectfully state, allege and pray:

1. On March 09, 2021, the Court issued an *Order Setting Initial Scheduling Conference*, Docket No. 4, whereby the initial scheduling conference in the above captioned case is scheduled to be held on June 16, 2021, at 9:00AM, via Microsoft Teams.

2. On April 15, 2021, the United States of America representing USDA Rural Housing Service, filed a *United States of America's Request for Extension of Time to File Answer to the Complaint*, Docket No. 10, and on April 19, 2021, the Court granted the same through *ORDER*, Docket No. 12, due by June 18, 2021.

3. The Plaintiffs hereby respectfully request this Honorable Court to continue the initial scheduling conference to allow the United States to file its Answer to the Complaint within the period of time granted by the Court and thus, prior to the parties appearing at a Initial Scheduling Conference, in the present case.

4. In further support of this motion, it is stated that said continuance of the Initial Scheduling Conference hearing is not requested for the purpose of delay and will not cause any prejudice, but on the contrary, will benefit all parties to the present case.

5. Prior to the filing of this motion for continuance, the Defendant Unites States, through its Assistant US Attorney Desiree Laborde-Sanfiorenzo stated that it is in agreement with the present request for continuance.

WHEREFORE, the Plaintiffs respectfully request that for the above stated reasons this Honorable Court grant the requested continuance of the Initial Scheduling Conference scheduled for June 16, 2021, at 9:00AM, in the present case.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 8th day of June, 2021.

/s/Roberto Figueroa Carrasquillo

USDC-PR No. 203614

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